

UNITED STATES DISTRICT COURT  
for the  
Eastern District of Michigan

United States of America

v.

Richard TURNER

Case No.

Case: 2:22-mj-30397

Assigned To : Unassigned

Assign. Date : 9/16/2022

Description: RE: RICHARD  
TURNER (EOB)

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 15, 2022 in the county of Oakland in the  
Eastern District of Michigan, the defendant(s) violated:

*Code Section**Offense Description*

21 USC § 841 (a)(1)

Possession with intent to distribute controlled substances

18 USC § 922(g)

Felon in possession of a firearm

This criminal complaint is based on these facts:

See attached affidavit

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence  
and/or by reliable electronic means.

Date: September 15, 2022

City and state: Detroit, MI

  
\_\_\_\_\_  
*Complainant's signature*  
SA James Richmond  
\_\_\_\_\_  
*Printed name and title*

  
\_\_\_\_\_  
*Judge's signature*  
David R. Grand, U.S. Magistrate Judge  
\_\_\_\_\_  
*Printed name and title*

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT**

I, James Richmond, Special Agent with the United States Drug Enforcement Administration (DEA), being duly sworn, depose and state the following:

**INTRODUCTION**

1. Your affiant is a Special Agent of the DEA and has been so since November 2016. Prior to the DEA, I served 4 years in the Marine Corps with the Marine Occupational Specialty of an Infantry Officer. After completion of Infantry Officer Course, I was assigned as a Rifle Platoon Commander, and later deployed to Afghanistan, where I witnessed the cultivation and trafficking of opium.

2. My official DEA duties include investigating criminal violations of the federal narcotics laws, including, but not limited to, Title 21, United States Code, Sections 841, 843, 846, and 848. I have received special training in the enforcement of laws concerning controlled substances as found in Title 21 of the United States Code. Some of the specialized training I have received includes, but is not limited to, classroom instruction concerning narcotics smuggling, money laundering investigations, conspiracy, complex investigations, and undercover. I have been involved in various types of undercover assignments, and in various drug investigations utilizing electronic surveillance, including the interception of wire communications, the debriefing of defendants, witnesses, and informants, as

well as others who have knowledge of the distribution and transportation of controlled substances, the laundering and concealing of proceeds from drug trafficking and the street gangs who participate in these illegal activities.

3. As a result of these investigative activities, I have conducted and participated in numerous investigations as a DEA Special Agent that have resulted in the seizure of marijuana, prescription pills, synthetic drugs, cocaine, methamphetamine, and heroin. I make this affidavit, in part, based on personal knowledge derived from my participation in this investigation and, in part, based upon information from oral and written reports about this investigation and others that I have received from United States law enforcement officers and Special Agents of the Drug Enforcement Administration. I am aware of the following information from several sources, including but not limited to, my own personal observations and participation in this investigation and my review and analysis of oral and written reports.

4. This affidavit is made in support of a criminal complaint for Richard TURNER for possession with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code Sections 922 (g), felon in possession of firearms and 924(c), possession of firearm in furtherance of drug trafficking.

5. On September 15, 2022, DEA executed a state search warrant at apartment 4XX located within the high rise apartment complex at 16XXX North Park Drive, Southfield, Michigan. During the execution of the search warrant, TURNER was located in the apartment and arrested for probable cause. According to a manager of 16XXX North Park Drive, Southfield, Richard TURNER is the listed tenant, and owner of Apartment 4XX.

6. During the search of apartment 4XX, agents found 219 grams of a brown substance which, based on my training and experience and that of other experienced agents at the search, and initial testing, appears to be heroin. Agents also found several bags of suspected methamphetamine in a clear plastic bags weighing approximately 2,557.5 grams, along with other distribution quantities of other narcotics that appear to be fentanyl. Agents also found other materials consistent with drug trafficking, including several scales, a blender, strainer, plastic bags, and a food-saver device for vacuum sealing. There was also a hydraulic press in the apartment for pressing narcotics which have been mixed with a cutting agent. Based on the quantities of drugs, seized items, and other facts in this affidavit, and on my training an experience, the drugs are consistent with distribution, not personal use.

7. Agents also located a .40 caliber Sig Sauer P229 pistol with the serial number obliterated/filed off, with a loaded magazine, in the same master bedroom

closet as the methamphetamine, underneath male clothing. There was also a 9mm Walther PPS pistol bearing serial number BB 4588 located in the master bedroom closet, on the top shelf, above the methamphetamine. Based on my examination of the firearms and the stampings thereon, and on my training and experience, both firearms are modern weapons and were manufactured outside the State of Michigan.

8. There were also letters addressed to Richard TUNER and other personal effects in the house. Agents also located prescription bottles with TURNER's name on them.

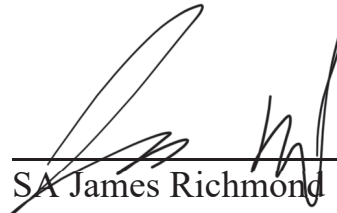
9. Based on a criminal history check, Richard Turner has several felony convictions.

10. A "True Narc" field test was conducted on a portion of the suspected methamphetamine and it tested positive for methamphetamine.

### **CONCLUSION**

11. Based on the facts stated above, there is probable cause to believe that Richard TURNER has committed a violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code Sections 922 (g), felon in

possession of firearms and 924(c), possession of firearm in furtherance of a drug trafficking crime.

A handwritten signature in black ink, appearing to read "SA James Richmond", is written over a horizontal line.

Drug Enforcement Administration

Sworn to before me and signed in my presence and/or by reliable electronic means.

A handwritten signature in blue ink, appearing to read "David R. Grand", is written over a horizontal line.

Honorable David R. Grand  
United States Magistrate Judge

September 15, 2022